

DUANE MORRIS LLP
Matthew Taylor, Esq.
John Dellaportas, Esq.
Evangelos Michailidis, Esq.
1540 Broadway
New York, NY 10036
Tel: (212) 692-1000
Fax: (212) 692-1020



WOODCOCK WASHBURN LLP
Scott J. Rocci, Esq.
Aleksander J. Goranin, Esq.
Daniel J. Goettle, Esq.
Dale Michael Heist, Esq.
Cira Centre, 12th Floor
2929 Arch Street
Philadelphia, PA 19104
Tel: (215) 568-3100
Fax: (215) 568-3439

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SAP AG and SAP AMERICA, INC.,

Plaintiffs,

v.

DATATERN, INC.,

Defendants.

Civil Action No. 11-cv-02648 (RJH)

ECF Case

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Evangelos Michailidis, a member in good standing of the bar of this Court, hereby moves for an Order allowing admission pro hac vice of

Aleksander J. Goranin, Esq.
Woodcock Washburn LLP
Cira Centre, 12th Floor
2929 Arch Street
Philadelphia, PA 19104

U.S. DISTRICT COURT
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Tel: (215) 568-3100
Fax: (215) 568-3439
agoranin@woodcock.com

Mr. Goranin is a member in good standing of the Bar of the States of Pennsylvania, Virginia, District of Columbia and New Jersey. Please see his certificates of good standing attached as Exhibit A to my supporting affidavit.

There are no pending disciplinary proceedings against Mr. Goranin in any State or Federal court.

Dated: July 1, 2011
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Evangelos Michailidis', is written over a horizontal line.

Evangelos Michailidis (EM-3383)

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**AFFIDAVIT OF EVANGELOS
MICHAILIDIS IN SUPPORT OF
MOTION TO ADMIT COUNSEL PRO
HAC VICE**

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

EVANGELOS MICHAILIDIS, being duly sworn, hereby deposes and says as follows:

1. I am an associate at the law firm Duane Morris LLP, counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement

based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Aleksander J. Goranin, Esq. as counsel pro hac vice to represent Plaintiffs in this matter.

2. I am a member in good standing of the bar of the State of New York, where I was admitted to practice law on January 16, 2008. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. Goranin since April, 2011.

4. Mr. Goranin is a partner at Woodcock Washburn LLP, in Philadelphia, Pennsylvania.


5. Mr. Goranin is a member in good standing of the Bar of the States of Pennsylvania, Virginia, District of Columbia and New Jersey. His certificates of good standing are attached as Exhibit A.

6. I have found Mr. Goranin to be a skilled attorney and a person of integrity. He is experienced in civil federal practice and is familiar with the Federal Rules of Procedure.

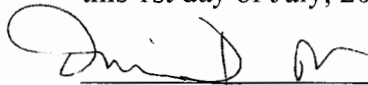
6. Accordingly, I am pleased to move for the admission of Mr. Goranin, pro hac vice.

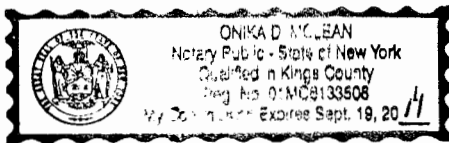
7. I respectfully submit a proposed order granting the admission of Mr. Goranin, pro hac vice, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Mr. Goranin, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.


Evangelos Michailidis

Sworn to before me
this 1st day of July, 2011


Notary Public





Supreme Court of Pennsylvania

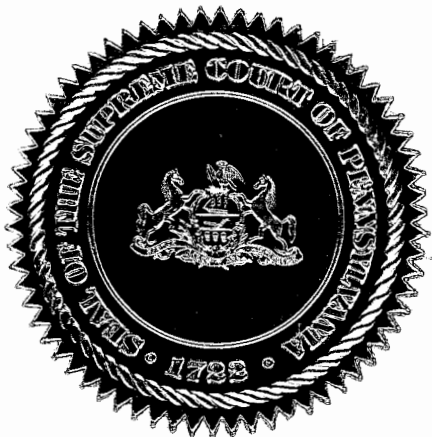
CERTIFICATE OF GOOD STANDING

Aleksander Jerzy Goranin, Esq.

DATE OF ADMISSION

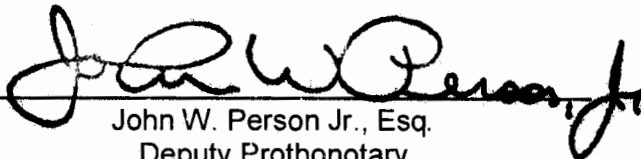
April 19, 2004

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: June 20, 2011


John W. Person Jr., Esq.
Deputy Prothonotary

**United States District & Bankruptcy Courts
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **ANGELA D. CAESAR**, Clerk of the United States District Court for the District of Columbia, do hereby certify that:

ALEKSANDER J. GORANIN

was, on the 3rd day of May A.D. 2010 admitted to practice as an Attorney at Law at the Bar of this Court, and is, according to the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of said Court in the City of Washington this 23rd day of June A.D. 2011.

ANGELA D. CAESAR, CLERK

By: _____

Deputy Clerk






VIRGINIA STATE BAR

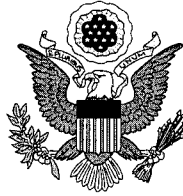
CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT **ALEKSANDER JERZY GORANIN** IS AN ASSOCIATE MEMBER OF THE VIRGINIA STATE BAR IN GOOD STANDING. **MR. GORANIN** WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 6, 2000**, AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

Issued June 20, 2011


KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER

Certificate of Good Standing



United States of America

District of New Jersey

I, WILLIAM T. WALSH, Clerk of the United States District Court for the District of New Jersey, do hereby certify that:

Aleksander J. Goranin

was duly admitted to practice in said Court as of May 2, 2005, and is in good standing as a member of the Bar of said Court.

*Dated at Newark, New Jersey
on: June 21, 2011*

WILLIAM T. WALSH, CLERK

By

A handwritten signature in black ink, appearing to read "C. Carlisle", written over a horizontal line.

Carey P. Carlisle, Deputy Clerk

*U. S. District Court for the District of New Jersey does not entertain a grievance committee.
Contact Board of Bar Examiners, New Jersey State Supreme Court.*

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SOUTHERN DISTRICT OF NEW YORK

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Plaintiffs,

v.

DATATERN, INC.,

Defendants.

Civil Action No. 11-cv-02648 (RJH)

ECF Case

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Upon the motion of Evangelos Michailidis at Duane Morris LLP, attorneys for Plaintiffs,
and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Aleksander J. Goranin, Esq.
Woodcock Washburn LLP
Cira Centre, 12th Floor
2929 Arch Street

Philadelphia, PA 19104
Tel: (215) 568-3100
Fax: (215) 568-3439
agoranin@woodcock.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: June 1, 2011
New York, New York

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SAP AG and SAP AMERICA, INC.,

Plaintiffs,

v.

DATATERN, INC.,

Defendants.
-----X

Civil Action No. 11-cv-02648 (RJH)

ECF Case

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)ss.:
COUNTY OF NEW YORK)

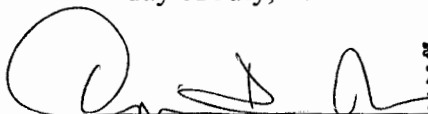
ELAINE HARRISON, being duly sworn, deposes and says:

1. I am employed by the firm of Duane Morris LLP, attorneys for SAP AG and SAP AMERICA, INC.
2. At the time of service I am not a party to the action, and am over 18 years of age who also resides in Queens, New York.
3. On July 7, 2011, I served a copy of the **Motion to Admit Counsel Pro Hac Vice** for Aleksander J. Goranin, Esq., upon Defendants Datatern, Inc. by depositing same in the official depository maintained and exclusively controlled by the United States Government at 1540 Broadway, New York, NY 10036-4086, true and correct copies of the same, properly enclosed in a postpaid wrapper addressed to counsel at the following address designated by them for that purpose upon:

Timothy John Haller
Gabriel Opatken
Gregory P. Casimer
Niro, Scavone, Haller & Niro
181 West Madison Street
Chicago, IL 60602


ELAINE HARRISON

Sworn to before me this
7th day of July, 2011.


Notary Public

